

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN OF OHIO
CLEVELAND DIVISION**

IN RE:

MARK B. TOMCO

Debtor(s)

) **IN PROCEEDINGS UNDER**
) **CHAPTER 13**
)
) **CASE NO.: 17-16020**
)
) **JUDGE: JESSICA E. PRICE SMITH**
)
)
) **RESPONSE TO MOTION FOR**
) **AUTHORITY TO SELL REAL PROPERTY**
)
)

NOW COMES THE SECURED CREDITOR, Nationstar Mortgage LLC d/b/a Mr. Cooper, by and through its counsel, and hereby files its Response to the Chapter 7 Trustee's Motion for Authority to Sell Real Property in the above-captioned matter. Nationstar Mortgage LLC d/b/a Mr. Cooper holds the first mortgage on the property located at 3519 Kneirim Drive, Lorain, OH 44053. As such it is entitled to have its first mortgage paid in full and/or at an amount approved by Creditor from the proceeds of the Sale.

WHEREFORE, Nationstar Mortgage LLC d/b/a Mr. Cooper prays that its mortgage be paid in full and/or at an amount approved by Creditor through the date of closing from the proceeds of the Sale.

/s/ Chris E. Manolis
Shapiro, Van Ess, Phillips & Barragate, LLP
Chris E. Manolis(OH-0076197)
4805 Montgomery Road, Suite 320
Norwood, OH 45212
Phone: (513) 396-8100
Fax: (847) 627-8805
cmanolis@logs.com

CERTIFICATE OF SERVICE

The undersigned does hereby certify that a copy of the foregoing was served, on the 19th day of December, 2017, to the following:

Via the Court's Electronic Case Filing System on these entities and individuals who are listed on the Court's Electronic Mail Notice List:

William J Balena, on behalf of Mark B Tomco, debtor(s), at docket@ohbksource.com

Waldemar J. Wojcik, on behalf of the Chapter 13 Trustee's office at
wwojcik@wojciklpa.com

United States Trustee at Registered address @usdoj.gov

And by regular U.S. mail, postage prepaid, on:

Mark B Tomco, 1606 Grafton Road, Elyria, OH 44035

/s/ Chris E. Manolis

Shapiro, Van Ess, Phillips & Barragate, LLP

Chris E. Manolis (OH-0076197)

4805 Montgomery Road, Suite 320

Norwood, OH 45212

Phone: (513) 396-8100

Fax: (847) 627-8805

Email: cmanolis@logs.com